

EXHIBIT E

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

TELCOM VENTURES LLC,

Plaintiff,

v.

APPLE, INC.,

Defendant.

Case No. 1:24-cv-23837-JEM

JURY TRIAL DEMANDED

**DECLARATION OF PETER KARABINIS IN SUPPORT OF PLAINTIFF TELCOM
VENTURES LLC'S OPPOSITION TO DEFENDANT APPLE INC.'S
MOTION TO TRANSFER VENUE**

I, Peter Karabinis, hereby declare:

1. I am over 18 years of age and competent to make this declaration. The statements in this declaration are based upon my personal knowledge. If called to testify as a witness in this matter, I could and would testify competently and truthfully to each statement in this declaration under oath.

2. I am aware that Telcom Ventures LLC has filed a patent infringement lawsuit against Apple Inc. in Telcom Ventures' home district—the U.S. District Court for the Southern District of Florida.

3. I understand that Apple has filed a motion seeking to transfer this case across the country to Northern California. I provide this declaration in support of Telcom Venture LLC's Opposition to Apple's Motion to Transfer Venue.

4. I am currently the Chief Technology Officer at Odyssey Wireless, Inc. and ENK Wireless, Inc. in Cary, North Carolina.

5. I am the first-named inventor on each of the patents that are asserted by Telcom Ventures against Apple in this lawsuit, and I am knowledgeable about the subject matter of those patents, which relate generally to systems and methods for mobile device mode enablement responsive to a proximity criterion or to sensing a physiological parameter, and to using such capabilities in executing financial transactions by a smartphone.

6. I am knowledgeable about the development and prosecution of the patents, the inventions covered by the patents, certain cited prior art, and matters relating to inventorship and patentability. I also have knowledge about the named plaintiff and owner/assignee of the patents, Telcom Ventures LLC.

7. I currently live in Cary, North Carolina, and my documents relating to the patents and this lawsuit are located in Cary, North Carolina.

8. I am committed to testifying at trial in the Southern District of Florida.

9. Traveling to Miami would be much more convenient for me. Raleigh-Durham International Airport is the closest airport to me. A flight from Raleigh to Miami is about two hours and fifteen minutes and within the same time zone. By comparison, a flight from Raleigh to Northern California is nearly six hours and crosses three time zones. Traveling across the country to Northern California would require a greater time commitment and would increase the chance of scheduling conflicts. Also, I would be much more fatigued traveling across the country through several time zones. I most likely would need to budget an additional day of travel to be ready to testify at trial if it were held in Northern California. If this case proceeds to trial in Miami, by comparison, it would be much easier for me to travel and testify.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 15 day of May 2025, in Greece.

Peter Karabinis

Peter Karabinis (May 15, 2025 00:32 EDT)

Peter Karabinis